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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

KURT WONG,

Plaintiff,

v.

WYNN LAS VEGAS, LLC, a Nevada Limited
Liability Company,

Defendant.

Case No.: 2:20-cv-02086-APG-NJK

**STIPULATION AND ORDER TO
EXTEND TIME TO SUBMIT DISMISSAL
PAPERWORK**

(FIRST REQUEST)

Plaintiff Kurt Wong (“Plaintiff” or “Wong”) and Defendant Wynn Las Vegas (“WLV” or “Defendant”), by and through their respective counsel, hereby stipulate and agree as follows:

1. On April 20, 2022, the Parties reached a settlement of this matter following a settlement conference with Hon. Nancy J. Koppe. Following the settlement, the Court ordered that dismissal paperwork must be filed by May 18, 2022. ECF No. 32.

2. Over the last several months, the Parties have been engaged in negotiations regarding the language of certain provisions in the Settlement Agreement. They recently resolved all remaining issues and finalized the Settlement Agreement.

3. Counsel for the Parties are working to obtain their respective client’s signatures on the Settlement Agreement and anticipate the same will be completed by July 15, 2022.

4. Due to the presence of a release of claims under the Age Discrimination in Employment Act (ADEA), Plaintiff’s execution of the Settlement Agreement will become effective seven (7) days thereafter.

5. Defendant anticipates tendering its remaining obligations, as set forth in the

1 Settlement Agreement, within seven (7) days after Plaintiff's execution becomes final and effective.

2 6. Therefore, the Parties request that the Court extend the deadline to file the
3 Stipulation of Dismissal and Proposed Order to **July 29, 2022**.

4 7. This stipulation and order is sought in good faith and not for the purpose of delay.

5 Dated this 12th day of July, 2022.

6 KEMP & KEMP

JACKSON LEWIS P.C.

7 /s/ James P. Kemp

/s/ Joshua A. Sliker

8 JAMES P. KEMP, ESQ.

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10 *Attorney for Plaintiff*

Attorneys for Defendant

11 *Kurt Wong*

Wynn Las Vegas, LLC

12 **ORDER**

13 IT IS SO ORDERED.

14 
15 ~~United States District Judge /~~
16 United States Magistrate Judge

17 Dated: July 13, 2022